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LATHAM & WATKINS LLP

February 13, 2018

VIA ECF

The Hon. Stuart M. Bernstein
United States Bankruptcy Judge
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, NY 10004

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Re: Securities Investor Protection Corporation v. Bernard L. Madoff Investment Securities LLC, No. 08-1789 (SMB); Irving H. Picard v. ABN AMRO Bank (Ireland) Ltd., et al, No. 10-5355 (SMB)

Dear Judge Bernstein:

I write on behalf of Defendants ABN AMRO Bank (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Bank (Ireland) Ltd.) (n/k/a ABN AMRO Retained Custodial Services (Ireland) Limited) and ABN AMRO Custodial Services (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Custodial Services (Ireland) Ltd.) (together, the “ABN Defendants”). I write specifically in response to your request during the February 8, 2018 hearing that all defendants provide the Court with a chart comparing the subpoenas issued by the Trustee during the Rule 2004 discovery process to the proposed requests attached as Exhibit D to the August 28, 2014 Declaration of Regina Griffin (No. 10-5355, ECF No. 67). A chart responsive to your request is attached hereto as Exhibit A.

At oral argument, the Court asked whether ABN AMRO had prepared such a chart, and I answered in the affirmative. In fact, ABN AMRO had previously compared the requests within the text of its supplemental brief (*see* No. 10-5355, ECF No. 134 at pp. 6-8), but had not provided a standalone chart, which we provide now.

Respectfully submitted,

/s Christopher Harris

Christopher R. Harris of
LATHAM & WATKINS LLP

Attachment

cc: Counsel of Record